IN THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF SOUTH CAROLINA GREENVILLE DIVISION

UNITED STATES OF AMERICA)	CR. NO. 6:20-210
)	
v.)	
)	
VIKTORS SUHORUKOVS)	

ESSENTIAL ELEMENTS OF VIOLATION OF 18 U.S.C. § 1341

The crime of using the mails to further a scheme or plan to defraud and to obtain money or property by means of false or fraudulent pretenses, representations, or promises has three (3) essential elements which are:

<u>ONE</u>: The defendant knowingly devised or knowingly participated in a scheme or artifice to defraud or to obtain money or property by means of false or fraudulent pretenses, representations, or promises that were material, as detailed in the indictment; and

<u>TWO</u>: The defendant did so with the intent to defraud; and

<u>THREE</u>: In advancing, or furthering, or carrying out this scheme to defraud and to obtain money or property by means of false or fraudulent pretenses, representations, or promises, the defendant knowingly caused to be delivered by mail or by any private or commercial interstate carrier any matter or thing according to the direction thereon.

Counts 1 - 4

MAXIMUM SENTENCE

- 1. Fine of \$250,000.00 and/or
- 2. Imprisonment of 20 years, and
- 3. Supervised Release of 3 years, and
- 4. Special Assessment of \$100.00